



Craig Duewall  
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May 21, 2021

**VIA EMAIL**

Paul R. Genender  
WEIL, GOTSHAL & MANGES LLP  
200 Crescent Court, Suite 300  
Dallas, TX 75201-6950  
214-746-7877  
*Paul.Genender@weil.com*

Re: Fieldwood's Notice of Removal of Operator for Cause

Dear Paul:

I am writing to respond to your letter May 21, 2021 letter regarding the prior dispute(s) between Fieldwood Energy LLC ("Fieldwood") and BP Exploration & Production Inc. ("BP") related to the Galapagos Area Loop Subsea Production System and Fieldwood's purported removal of BP as operator of the same. As set forth in its May 19, 2021 letter, BP disputes that Fieldwood's May 14, 2021 letter was in any way effective at removing BP as operator. There is no basis to remove BP as operator, and Fieldwood has not properly identified any basis to do so under the LSPS OA (as defined in BP's May 19, 2021 letter). As such, BP has invoked the Dispute Resolution Procedures of the LSPS OA.

Based on your May 21, 2021 letter, it appears Fieldwood is refusing to comply with the dispute resolution provisions of the LSPS OA. Please confirm that our interpretation is correct. BP renews its demand that Fieldwood designate a Management Representative pursuant to Exhibit "F" Dispute Resolution Procedures attached to the LSPS OA for purposes of seeking to resolve this Dispute.

Again, we have not attempted by way of this response to counter every misstatement or incorrect assertion in Fieldwood's May 14, 2021 letter or your May 21, 2021 letter, nor have we exhausted every argument that BP may raise in response to any effort by Fieldwood before any tribunal to remove BP as operator. All rights, claims, remedies, defenses and arguments of BP are reserved and preserved in all respects.

**Greenberg Traurig, LLP | Attorneys at Law**

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Paul R. Genender  
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Sincerely,



Craig Duewall

CG/gj